
The Use of Environmental Management Systems in Permitting Decisions

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Background

- ❑ SC Environmental Excellence Program
 - ❑ Voluntary Environmental Leadership Program created in 1997
 - ❑ 30 members with over 50 facilities in program
 - ❑ EMS component of membership criteria
 - ❑ SC Environmental Innovations Pilot Program
 - ❑ Authorizing legislation in 2002
 - ❑ EMS requirement for participation in pilot
 - ❑ EMSs in Consent Decree/Settlement Agreement
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Project Background

- ❑ EPA State Innovations Grant awarded May 2005
 - ❑ EPA Office of Solid Waste & Office of Policy, Economics and Innovations
 - ❑ Incorporate EMSs into the regulatory framework
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Project Goals

- ❑ Explore how an effective EMS can impact specific permit requirements
 - ❑ Determine how EMS can help with consistency in developing, issuing, monitoring, and enforcing a permit
 - ❑ Evaluate benefits of incorporating EMS as incentive for permitting options
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Project Activities

- ❑ Form Project Advisory Team
 - ❑ Retain EMS consultant
 - ❑ Solicit participation of up to 4 facilities
 - ❑ Conduct internal EMS training
 - ❑ Analyze facility permits and EMSs
 - ❑ Evaluate potential permit revisions based on findings
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Participating Facilities

❑ Dayco Products

- Conditional Major Air Permit
- NPDES Stormwater General Permit

❑ Charleston Air Force Base

- RCRA Permit
- Title V Air Permit
- NPDES Stormwater General Permit



Participating Facilities Cont.

❑ Milliken-Dewey Plant

- RCRA Permit
- Title V Air Permit
- Wastewater NPDES Permit
- NPDES Stormwater General Permit

❑ Holcim

- RCRA Permit
 - Title V Air Permit
 - Wastewater NPDES Permit
 - Drinking water Permit
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EMS Staff Trainings

❑ EMS 101

- ❑ 4 hour training
- ❑ Dayco Products participated as the case study

❑ EMS in Permitting

- ❑ 12 hour additional training
 - ❑ Charleston AFB, Holcim and Dayco Products participated as case studies
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Site Visits

- ❑ Review of Facilities' Permits
 - ❑ Review of Facilities' EMS
 - ❑ (2) ISO 14001
 - ❑ ISO 14001/RC
 - ❑ ISO Like
 - ❑ Comparison charts developed as a tool
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Preliminary Findings

- ❑ EMS assisted in tightening compliance system
 - ❑ EMS increased performance
 - ❑ EMS increased the roles and responsibilities
 - ❑ EMS/Permits have very similar requirements
 - ❑ Permits address corrective actions in more detail
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Next Step of Project

Project Performance Measures

- ❑ Environmental performance in terms of waste reductions or waste avoidance
- ❑ Environmental condition indicators
- ❑ Environmental compliance indicators
- ❑ Pollution prevention and waste minimization opportunities
- ❑ Quality and quantity of environmental information produced
- ❑ Administrative cost savings and resource efficiencies

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